



Your business
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 29, 2017

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2017 ETC Annual Report of Reservation Telephone Cooperative
Study Area Code 381632**

Dear Ms. Dortch:

On behalf of Reservation Telephone Cooperative (“Company”), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.¹ Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is being filed this date via the FCC’s Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form****REDACTED FOR PUBLIC INSPECTION**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Shane Hart
<035>	Contact Telephone Number: Number of the person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	shaneh@restel.com
	Form Type	54.313 and 54.422

(300) Unfulfilled Service Request Data Collection Form	FCC Form 481
	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

<300> Unfulfilled service request (voice)

340

381632nd310.pdf

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

191

381632nd330.pdf

<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
--	--

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

(500) Compliance With Service Quality Standards and Consumer Protection Rules Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
381632nd510 .pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations Data Collection Form	REDACTED FOR PUBLIC INSPECTION	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	---------------------------------------	--

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	381632nd610.pdf

Page 8

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com
<810>	Reporting Carrier	Reservation Telephone Cooperative
<811>	Holding Company	Not Applicable
<812>	Operating Company	Reservation Telephone Cooperative

[illegible]

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

<900> Does the filing entity offer tribal land services? (Y/N) Yes

<910> Tribal Land(s) on which ETC Serves

Three Affiliated Tribes of the Fort Berthold Reservation

<920> Tribal Government Engagement Obligation

381632nd920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

<1020> Broadband comparability certification

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP <http://www.reservation-telephone.com/phone/lifeline/>

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

(2005) Price Cap Carrier Additional Documentation Data Collection Form <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.	<input style="width: 100px; height: 20px; border: 1px solid black;" type="text"/>	
<2022> Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.	<input style="width: 100px; height: 20px; border: 1px solid black;" type="text"/>	
<2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.	<input style="width: 100px; height: 20px; border: 1px solid black;" type="text"/>	
<2024A> Round 2 Recipient of Incremental Support?	<input style="width: 100px; height: 20px; border: 1px solid black;" type="text"/>	<input style="width: 200px; height: 60px; border: 1px solid black;" type="text"/>
<2024B> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.	Name of Attached Document Listing Required Information	<input style="width: 200px; height: 60px; border: 1px solid black;" type="text"/>
<2025A> Round 2 Recipient of Incremental Support?	<input style="width: 100px; height: 20px; border: 1px solid black;" type="text"/>	
<2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).	Name of Attached Document Listing Required Information	<input style="width: 200px; height: 60px; border: 1px solid black;" type="text"/>
<2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)		<input style="width: 100px; height: 20px; border: 1px solid black;" type="text"/>

(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)	Yes - Attach Certification	
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		381632nd3010.pdf
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	Yes - Attach New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	381632nd3012b.xlsm
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input checked="" type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	381632nd3017.pdf
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input type="radio"/>
	If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		
(3019)	Either a copy of their audited financial statement; or		<input type="checkbox"/>
(3020)	(2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3021)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3022)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<input type="checkbox"/>
	If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

REDACTED FOR PUBLIC INSPECTION

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



(4005) Rural Broadband Experiment Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
--	---

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
--	--	--

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
---	--	--

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	
---	--	--

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	381632
<015> Study Area Name	RESERVATION TEL COOP
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Shane Hart
<035> Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	381632
<015> Study Area Name	RESERVATION TEL COOP
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Shane Hart
<035> Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>JSI</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	<u>JSI</u>
Name of Reporting Carrier:	<u>RESERVATION TEL COOP</u>
Signature of Authorized Officer:	<u>CERTIFIED ONLINE</u> Date: <u>06/28/2017</u>
Printed name of Authorized Officer:	<u>Shane Hart</u>
Title or position of Authorized Officer:	<u>CEO/GM</u>
Telephone number of Authorized Officer:	<u>7018625229 ext.</u>
Study Area Code of Reporting Carrier:	<u>381632</u> Filing Due Date for this form: <u>07/03/2017</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	<u>RESERVATION TEL COOP</u>
Name of Authorized Agent Firm:	<u>JSI</u>
Signature of Authorized Agent or Employee of Agent:	<u>CERTIFIED ONLINE</u> Date: <u>06/28/2017</u>
Name of Authorized Agent Employee:	<u>Cassandra Heyne</u>
Title or position of Authorized Agent or Employee of Agent	<u>Consultant</u>
Telephone number of Authorized Agent or Employee of Agent:	<u>3014597590 ext.</u>
Study Area Code of Reporting Carrier:	<u>381632</u> Filing Due Date for this form: <u>07/03/2017</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

Reservation Telephone Cooperative

Line 310 – Detail on Unfulfilled Service Requests for Voice Service for 2016

In 2016, Reservation Telephone Cooperative (“RTC”) received 340 requests for voice service that could not be fulfilled in a timely manner. RTC is located in the region of North Dakota that is experiencing a population boom due to the Bakken oil industry. This production has a direct impact on the increase in population and in turn a demand for RTC's services. As such, people are moving to RTC's service area in unprecedented numbers. RTC tries to accommodate all requests for service as quickly as possible, but the requests outweigh RTC's resources. All 340 requests for voice service were a result of new construction and population growth in the RTC service area; and new requests that came in after the construction season ended. In order to improve its ability to fulfill requests for service, RTC has hired additional employees and invested in additional equipment to help manage service requests. RTC also has a shortened construction season due to harsh climate, which adds to the delay to build lines to new homes in the service area.

Reservation Telephone Cooperative

Line 330 – Detail on Unfulfilled Service Requests for Broadband Service for 2016

In 2016, Reservation Telephone Cooperative (“RTC”) received 191 requests for broadband service that could not be fulfilled in a timely manner. RTC is located in the region of North Dakota that is experiencing a population boom due to the Bakken oil industry. This production has a direct impact on the increase in population and in turn a demand for RTC's services. As such, people are moving to RTC's service area in unprecedented numbers. RTC tries to accommodate all requests for service as quickly as possible, but the requests outweigh RTC's resources. All 191 requests for broadband service were a result of new construction and population growth in the RTC service area, or the new requests came after the construction season had ended. In order to improve its ability to fulfill requests for service, RTC has hired additional employees and invested in additional equipment to help manage service requests. RTC also has a shortened construction season due to harsh climate, which adds to the delay to build lines to new homes in the service area.

**Reservation Telephone Cooperative's Demonstration of Compliance with
Applicable Service Quality Standards and Consumer Protection Rules**

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

Reservation Telephone Cooperative (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under federal law and, to a limited extent under North Dakota state law as a telecommunications carrier subject to North Dakota Public Service Commission regulation. These obligations include, but are not limited to, the following: (1) adherence to state requirements that the Company complies with consumer protection and service quality standards pursuant to North Dakota Administrative Code Article 69, including customer requests for lowest price

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

service alternatives (69-09-05-01), discontinuance of telecommunications services (69-09-05-02), deposits and guarantees (69-09-05-03); (2) truth-in-billing requirements, and (3) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

Reservation Telephone Cooperative's Ability to Function in Emergency Situations

Reservation Telephone Cooperative hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2)¹ and North Dakota Administrative Code 69-09-05-12. The Company's voice and broadband network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is either supplied with permanent standby generators or is generator-ready, and battery back-up that enables the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company's central office can maintain a minimum 8 hours of battery reserve rated for peak traffic load requirements, and an auxiliary power unit is installed which can be delivered and connected within four hours. The Company has permanent generators, and the ability to connect portable generators at all locations. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators will continue to run as long as the Company has access to fuel. The Company tests the batteries at least once per

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

year. The Company complies with the FCC's backup power requirements, effective October 16, 2015.

REDACTED FOR PUBLIC INSPECTION

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

<701> Residential Local Service Charge Effective Date

1/1/2017

<702> Single State-wide Residential Local Service Charge

<703>

<a1>	<a2>	<a3>	<b1>	<b2>	<b3>	<b4>	<b5>	<c>
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
ND	EMMET		FR	22.46	0.0	0.0	0.0	22.46
ND	KENMARE		FR	22.46	0.0	0.0	0.0	22.46
ND	GARRISON		FR	22.46	0.0	0.0	0.0	22.46
ND	NORMA		FR	22.46	0.0	0.0	0.0	22.46
ND	PLAZA		FR	22.46	0.0	0.0	0.0	22.46
ND	DOUGLAS		FR	22.46	0.0	0.0	0.0	22.46
ND	SQUAW GAP		FR	22.46	0.0	0.0	0.0	22.46
ND	ARNEGARD		FR	22.46	0.0	0.0	0.0	22.46
ND	NEW TOWN		FR	22.46	0.0	0.0	0.0	22.46
ND	KEENE		FR	22.46	0.0	0.0	0.0	22.46
ND	MAX		FR	22.46	0.0	0.0	0.0	22.46
ND	MAKOTI		FR	22.46	0.0	0.0	0.0	22.46
ND	ROSEGLEN		FR	22.46	0.0	0.0	0.0	22.46
ND	ROSS		FR	22.46	0.0	0.0	0.0	22.46
ND	RYDER		FR	22.46	0.0	0.0	0.0	22.46
ND	MANDAREE		FR	22.46	0.0	0.0	0.0	22.46
ND	ALEXANDER		FR	22.46	0.0	0.0	0.0	22.46
ND	WATFORD CITY		FR	22.46	0.0	0.0	0.0	22.46
ND	SPENCER		FR	22.46	0.0	0.0	0.0	22.46
ND	PARSHALL		FR	22.46	0.0	0.0	0.0	22.46
MT	SQUAW GAP		FR	22.46	0.0	0.0	0.0	22.46

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	381632
-------	-----------------	--------

<015> Study Area Name	RESERVATION TEL COOP
-----------------------	----------------------

<020>	Program Year	2018
-------	--------------	------

<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
-------	---	------------

<035> Contact Telephone Number - Number of person identified in data line <030> 7018623115 ext.

<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com
-------	---	-------------------

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
-------	------	------	------	------	-----	------	------	------	------

[illegible]



June 28, 2017

Mark Fox, Chairman
Three Affiliated Tribes
404 Frontage Road
New Town, ND 58763-9404

Dear Chairman Fox:

Reservation Telephone Cooperative ("RTC"), your independent telecommunications provider serving over 7,000 customers throughout 20 exchanges in Northwestern North Dakota wishes to confirm with the tribe that we have engaged with the Three Affiliated Tribes of the Fort Berthold Reservation about broadband capabilities and potential broadband opportunities on Tribally-owned lands within our service area and that your broadband needs are being met.

In November 2011, the Federal Communications Commission ("FCC") comprehensively reformed the Universal Service Fund ("USF") which helps companies like RTC provide state-of-the-art communications services in high-cost and rural areas. Among the reforms, the FCC adopted a rule requiring Eligible Telecommunications Carriers who receive high-cost USF support to engage with Tribal leaders about broadband deployment on Tribally-owned lands and report annually on five specific outreach activities. In July 2012, the FCC's Office of Native Affairs Policy ("ONAP") issued specific guidance on outreach and engagement activities between telecommunications providers and Tribal governments. Outreach and engagement activities must be ongoing, as RTC is required to submit annual reports to the FCC that certify and describe the engagement efforts.

RTC has a long history of dedicated involvement with the Fort Berthold Reservation. RTC has been providing voice telephone service to residents and businesses on the Fort Berthold Reservation since 1951. Approximately 95% of residents have access to high speed internet at speeds of up to 1 Gig. With FTTH, customers can use, participate in, and enjoy broadband-enabled applications such as distance learning and healthcare, streaming HD video, and much more.

In addition to providing state-of-the-art telecommunications services to the Fort Berthold Reservation, RTC actively supports the community through donations and sponsorships. Some of RTC's contributions and community involvement include: local Head Start programs, the Parshall Resource Center, Tribal Social Services, Red Sage and the Annual Four Bears Benefit Swim, Elders groups, employee appreciation and Christmas parties for tribal employers, among many other things.

Shane Hart
CEO/General Manager

PO Box 68
Parshall ND 58770
phone: 701.862.3115
phone: 1.888.862.3115
fax: 701.862.3821
web: www.RTC.coop

This institution is an equal opportunity provider and employer.



Given our pre-existing relationship and that RTC and the leaders of the Fort Berthold Reservation have been actively engaged about broadband deployment for years, we believe that complying with the FCC's Tribal engagement obligations in 2016 was straight-forward for both parties and the requirements can be satisfied by a meeting to review what RTC has done on the Fort Berthold Reservation in 2016 and what needs you may have going forward.

As explained above, RTC is now required to report to the FCC annually on Tribal Outreach activities, and RTC seeks your concurrence that the company considered the following items during interactions with the Tribal government in 2016. Specific examples are provided for each item.

1. Needs assessment and deployment planning focused on anchor institutions:

RTC provides broadband to the following anchor institutions: Three Affiliated Tribes Administration Building, numerous other tribal offices and programs, White Shield School, Mandaree School, New Town Public Schools, Parshall Public Schools, Fort Berthold Community College, Parshall Public Library, New Town Public Library, Elbowoods Memorial Healthcare Center, Minne-Tohe Clinic, Trinity Community Clinic in New Town, Parshall Medical Center, Northeast Segment Health Center, White Shield Clinic, Mandaree Field Clinic, Three Affiliated Tribes Fire Management Program, New Town Fire Department, Parshall Fire Department, New Town ambulance squad, Parshall ambulance squad, Three Affiliated Tribes Police Department, New Town Police Department, and Fort Berthold Rural Water.

Looking forward, RTC is committed to working with the Three Affiliated Tribes to ensure that state-of-the-art broadband services are provided to schools, libraries, health care centers, and Tribal government offices. We are available and willing to discuss options for building or upgrading broadband networks at any of your community's anchor institutions. Additionally, we are interested in learning if residents and businesses on the Fort Berthold Reservation have needs for any of the other services our company provides, such as high definition surveillance cameras, phone systems, TV service, and specialized circuits and internet connections.

2. Feasibility and sustainability planning:

RTC evaluates potential broadband projects on a number of factors, including whether the project is technically and financially feasible and whether there is an opportunity for a return on investment. RTC is committed to providing broadband to all customers within our service area, which includes a large portion of the Fort Berthold Reservation.

3. Marketing Services in a Culturally Sensitive Manner

RTC has consistently recognized and respected any cultural attributes of the Three Affiliated Tribes in our marketing efforts and when we communicate with the Tribal council. RTC invites

Shane Hart
CEO/General Manager

PO Box 68
Parshall ND 58770
phone: 701.862.3115
phone: 1.888.862.3115
fax: 701.862.3821
web: www.RTC.coop

This institution is an equal opportunity provider and employer.



members of the Three Affiliated Tribes to keep us informed about cultural events in the community, and we are willing to work with members of the Three Affiliated Tribes to develop marketing materials tailored to your needs. RTC has always employed tribal members and we currently employ 10 tribal members. Two of our customer service locations are located on Fort Berthold: the headquarters in Parshall and our customer service office in New Town.

4. Rights of Way and Other Permitting and Review Processes

As RTC has been providing service on the Fort Berthold Reservation for 66 years, we are well familiarized with rights of way and land use permitting processes. RTC wishes to stay informed about rights of way and land use permitting processes so that potential broadband projects can move forward quickly and efficiently.

5. Compliance with Tribal Business and Licensing Requirements

RTC is also well familiarized with your Tribal business and licensing requirements, and responds to them as requested.

Looking ahead, RTC is committed to maintaining a strong relationship and a high level of engagement with the Three Affiliated Tribes. We are interested in working together to develop plans to provide service to all new construction sites on the reservation. We hope that RTC and the Three Affiliated Tribes will collaborate on new ways to bring economic development to the Fort Berthold Reservation by ensuring that residents and businesses have advanced telecommunications and broadband services.

RTC looks forward to a new year of productive and mutually-beneficial engagement with the Three Affiliated Tribes.

Sincerely,

Shane Hart
CEO/General Manager

Shane Hart
CEO/General Manager

PO Box 68
Parshall ND 58770
phone: 701.862.3115
phone: 1.888.862.3115
fax: 701.862.3821
web: www.RTC.coop

This institution is an equal opportunity provider and employer.

Name	Service Address
NEW TOWN CITY AUDITORS OFFICE	223 3RD ST S NEW TOWN
NEW TOWN HIGH SCHOOL	3967 89TH AVE NW NEW TOWN
PARSHALL RURAL FIRE	311 4TH ST SW PARSHALL
RYDER CITY OF	260 MAIN ST RYDER
THREE AFFILIATED TRIBES	429 9TH ST N NEW TOWN
THREE AFFILIATED TRIBES	32 MAIN ST NEW TOWN
THREE AFFILIATED TRIBES	105 4TH AVE NE MANDAREE
THREE AFFILIATED TRIBES	204 MAIN ST NEW TOWN
THREE AFFILIATED TRIBES	227 MAIN ST NEW TOWN
THREE AFFILIATED TRIBES	315 2ND ST SE NEW TOWN
WATFORD CITY PARK DISTRICT	125 3RD ST SE WATFORD CITY
WATFORD CITY PARK DISTRICT	125 3RD ST SE WATFORD CITY

Reservation Telephone Cooperative (SAC 381632)

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

Reservation Telephone Cooperative hereby certifies that throughout 2016, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, the Company offers broadband service at the highest available speed.

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY